

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

APPLICANT: Eric S. BARNES

GROUP: 2625

APPLICATION: 10/644,468

EXAMINER: H. Kassa

FILED: August 20, 2003

CONFIRMATION: 5956

**FOR: APPARATUS AND METHOD FOR GENERATING REUSABLE
COMPOSITE COMPONENTS DURING DYNAMIC DOCUMENT
CONSTRUCTION**

**Commissioner for Patents
PO Box 1450
Alexandria, Virginia 22313-1450**

Sir:

REPLY BRIEF FOR APPELLANT

This Reply Brief is being submitted in response to the Examiner's Answer, dated September 2, 2010, in connection with the above-identified application.

I. SUPPLEMENTAL ARGUMENTS

Claim 1 and 30-33 have been rejected under 35 U.S.C. §103 for being unpatentable over Brintzenhofe et al. (Published US Patent Application 2005/0223320) in view of McBrearty et al. (US Patent Number 6,744,452). This rejection is respectfully traversed.

It is respectfully noted that the Examiner explicitly states, on page 5 of the Examiner's Answer, that Brintzenhofe et al. teaches most of the claimed subject matter of claim 1, except "obtaining a list of document components from said page and identifying any non-cached components."

Notwithstanding the Examiner's assertion, independent claim 1 does not recite any limitation associated with "identifying any non-cached components." Thus, this remark should be stricken because the reamrk is not relevant to the claimed invention of claim 1.

Independent Claim 1

As previously pointed out in the Appeal Brief, Brintzenhofe et al. fails to disclose or suggest obtaining a list of document components associated with an interpreted page, the list of document components including cacheable reusable document components and non-cached document components associated with the interpreted page.

In rebuttal, the Examiner asserts that Brintzenhofe et al. teaches; at paragraph [0086], lines 1-6; "a composite document including different types of components." The Examiner further asserts that the taught "composite document;" at paragraph [0086], lines 1-6; of Brintzenhofe et al. has cacheable reusable components such as forms. Lastly, the Examiner asserts that Brintzenhofe et al. teaches; at paragraph [0086], lines 1-6; a "list, associated with an interpreted page cacheable reusable, of document components including cacheable reusable components."

Initially, the Examiner's rebuttal is very confusing, in that it appears to be a recitation of incomplete thoughts. Notwithstanding, the Applicant will attempt to address this rebuttal.

Brintzenhofe et al. discloses; at paragraph [0086]:

A composition typically combines content, design and media in a usable form. In general, content is information substance, in forms such as communication-bearing text, images, symbols, data structures and other. Media, in general, is presentation space, in forms such as paper, sequenced computer screens, linked hypertext pages and other. A design is typically information presentation specifications, in forms such as definitions of allowable content and media combinations, and methods for rendering presentations of particular content to particular media. Thus, a composition may be viewed as a combination of compatible content, media, and design objects capable of producing a specific presentation of specific information in a specific form. In one embodiment of the present invention, design, media, and content are the primary facets of a composition. A composition typically results from a request to render a media-specific presentation of an open document. The present invention is able to elaborate the document structure as necessary to compute fully explicit layout and drawing information.

It is clear from the above passage of Brintzenhofe et al. that Brintzenhofe et al. fails to disclose or suggest obtaining a list of document components associated with an interpreted page, the list of document components including cacheable reusable document components and non-cached document components associated with the interpreted page because this passage is void of any discussion pertaining to obtaining any type of list.

Moreover, the above passage of Brintzenhofe et al. is void of any discussion pertaining to a list of document components including cacheable reusable document components and non-cached document components associated with the interpreted page.

As previously pointed out in the Appeal Brief, Brintzenhofe et al. fails to disclose or suggest identifying the cacheable reusable document components included in the obtained list of documents components associated with the interpreted page.

In further rebuttal, the Examiner asserts that Brintzenhofe et al. teaches; at paragraph [0086], lines 3-9; that “the cacheable reusable document is identified as the file, identifying the cacheable reusable document components included in the obtained list of document components associated **[sic]** the interpreted page.”

Again, it is clear from the above passage of Brintzenhofe et al. that Brintzenhofe et al. fails to disclose or suggest identifying the cacheable reusable document components included in the obtained list of documents components associated with the interpreted page because this passage is void of any discussion pertaining to an identification process to identify cacheable reusable document components.

Furthermore, the above passage of Brintzenhofe et al. is void of any discussion pertaining to cacheable reusable document components which included in the obtained list of documents components associated with the interpreted page because this passage is void of any discussion pertaining to a list of documents components associated with the interpreted page.

As previously set forth in the Appeal Brief, the Examiner alleges that McBrearty et al. teaches that a web page is obtained from a server and a check is made to determine if non-cached components are present.

Notwithstanding the Examiner's assertion, the actual teachings of McBrearty et al. fail to support the Examiner's characterization of the process described by McBrearty et al. More specifically, McBrearty et al. teaches that when a web page is requested, the process checks to determine if the web page has been cached or not cached.

In contrast, the presently claimed invention clearly sets forth the obtainment of a list of document components associated with an interpreted page, the list of document components including cacheable reusable document components and non-cached document components associated with the interpreted page.

Moreover, the presently claimed invention clearly sets forth that each interpreted page has cacheable reusable document components and non-cached document components.

Lastly, the presently claimed invention clearly sets forth the identification of the cacheable reusable document components included in the obtained list of documents components associated with the interpreted page.

Checking if a web page has been cached, as taught by McBrearty et al., fails to teach or suggest obtaining a list of document components associated with an interpreted page, the list of document components including cacheable reusable document components and non-cached document components associated with the interpreted page; and/or identifying the cacheable reusable document components included in the obtained list of documents components associated with the interpreted page.

In rebuttal, the Examiner asserts that the teachings of McBrearty et al.; at column 9, lines 28-34; are merely relied upon to show obtaining a list of document components and non-cached document components associated with the interpreted page. Notwithstanding this assertion, these specific teachings of McBrearty et al. fail to teach or suggest obtaining a list of document components and non-cached document components associated with the interpreted page.

More specifically, McBrearty et al. discloses; at column 9, lines 28-54:

FIG. 5 is a flow chart illustrating the processes of one embodiment of the present invention. The process begins (step 501) after the web browser is executed on the data processing system. The user requests a web page (step 503). The request is handled either by a remote server connected to the user data processing system via the Internet (or Intranet) or alternatively by a local browser cache of the data processing system. (i.e., it was previously downloaded) A check is made to determine if the requested page is in the user's browser cache (step 505). If the web page is in the browser cache, the user's preference is read and a determination is made of whether to use the cached file instead of downloading the file from the server (step 509) based on the user preference. The user preference may be entered during setup of the web browser application or on a prompt to the user prior to retrieving the web page. If the cache file is to be used, the processor searches for the cached file in the user's browser cache directory (step 515). If the cache file is found, then it is read from the user's browser cache directory (step 516). The web page is then displayed with a cache indicator (step 517) alerting the user that the displayed web page was retrieved from the cache. The user may then select the refresh button to force a download from the server via the Internet. When this page is reloaded with a non-cached web page, the cached-page indicator is removed to show the new status of the displayed page. If, however, the cache file is not found (i.e., the requested page is not cached or has been purged from the cache file directory), the remote server is contacted and the web page downloaded via the Internet (step 513).

Again, it is clear from the above passage of McBrearty et al. that McBrearty et al. fails to disclose or suggest obtaining a list of document components and non-cached document components associated with the interpreted page because this passage is void of any discussion pertaining to document components or non-cached document components.

More specifically, the above passage of McBrearty et al. is clearly directed to determining if a requested file has been previously cached. The above passage of McBrearty et al. is not concern with the obtaining of any type of lists.

Thus, McBrearty et al., fails to teach or suggest obtaining a list of document components associated with an interpreted page, the list of document components including cacheable reusable document components and non-cached document components associated with the interpreted page; and/or identifying the cacheable reusable document components included in the obtained list of documents components associated with the interpreted page.

In summary, the Examiner recognizes that Brintzenhofe et al. fails to disclose obtaining a list of document components associated with an interpreted page cacheable reusable, the list of document components including cacheable reusable document components and non-cached document components associated with the interpreted page; and/or identifying the cacheable reusable document components included in the obtained list of documents components associated with the interpreted page.

Moreover, McBrearty et al. fails to disclose or suggest obtaining a list of document components associated with an interpreted page cacheable reusable, the list of document components including cacheable reusable document components and non-cached document components associated with the interpreted page; and/or identifying the cacheable reusable document components included in the obtained list of documents components associated with the interpreted page.

Therefore, contrary to the Examiner's allegations, the combination of Brintzenhofe et al. in view of McBrearty et al. fails to render the presently claimed invention, as set by independent claim 1, obvious to one of ordinary skill in the art.

Dependent Claim 30

As previously set forth in the Appeal Brief, dependent claim 30 recites caching, to form a composite reusable underlay, a combination of identified cacheable reusable document components rendered, relative to each identified cacheable reusable document component in the combination, to a full page size.

The Examiner asserts that Brintzenhofe et al. teaches, at paragraphs **[0133]** and **[0134]**, the specific limitation of dependent claim 30.

Contrary to the Examiner's assertion, Brintzenhofe et al. teaches, at paragraphs **[0133]** and **[0134]**, the relationship between a content tree and a brochure composition.

Paragraphs **[0133]** and **[0134]** of Brintzenhofe et al. are void of any discussion of caching a combination of identified cacheable reusable document components.

In addition, paragraphs **[0133]** and **[0134]** of Brintzenhofe et al. are void of any discussion of forming a composite reusable underlay.

Moreover, paragraphs **[0133]** and **[0134]** of Brintzenhofe et al. are void of any discussion of caching, to form a composite reusable underlay, a combination of identified cacheable reusable document components rendered, relative to each identified cacheable reusable document component in the combination, to a full page size.

In rebuttal, the Examiner asserts that Brintzenhofe et al. teaches that the first node (Bass Products) has a combination of reusable components to render a full page.

Contrary to the Examiner's assertions, paragraphs **[0133]** and **[0134]** of Brintzenhofe et al. are directed to a content tree comprised of various nodes. Paragraphs **[0133]** and **[0134]** of Brintzenhofe et al. are void of any discussion pertaining to rendering.

More specifically, paragraphs **[0133]** and **[0134]** of Brintzenhofe et al. are void of any discussion pertaining to forming a composite reusable underlay which includes a combination of identified cacheable reusable document components rendered, relative to each identified cacheable reusable document component in the combination, to a full page size.

Therefore, contrary to the Examiner's allegations, the combination of Brintzenhofe et al. in view of McBrearty et al. fails to render the presently claimed invention, as set by dependent claim 30, obvious to one of ordinary skill in the art.

Independent Claim 31

As previously pointed out in the Appeal Brief, Brintzenhofe et al. fails to disclose or suggest obtaining a list of document components associated with an interpreted page, the list of document components including cacheable reusable document components and non-cached document components associated with the interpreted page.

In rebuttal, the Examiner asserts that Brintzenhofe et al. teaches; at paragraph [0086], lines 1-6; "a composite document including different types of components." The Examiner further asserts that the taught "composite document;" at paragraph [0086], lines 1-6; of Brintzenhofe et al. has cacheable reusable components such as forms. Lastly, the Examiner asserts that Brintzenhofe et al. teaches; at paragraph [0086], lines 1-6; a "list, associated with an interpreted page cacheable reusable, of document components including cacheable reusable components."

Initially, the Examiner's rebuttal is very confusing, in that it appears to be a recitation of incomplete thoughts. Notwithstanding, the Applicant will attempt to address this rebuttal.

Brintzenhofe et al. discloses; at paragraph [0086]:

A composition typically combines content, design and media in a usable form. In general, content is information substance, in forms such as communication-bearing text, images, symbols, data structures and other. Media, in general, is presentation space, in forms such as paper, sequenced computer screens, linked hypertext pages and other. A design is typically information presentation specifications, in forms such as definitions of allowable content and media combinations, and methods for rendering presentations of particular content to particular media. Thus, a composition may be viewed as a combination of compatible content, media, and design objects capable of producing a specific presentation of specific information in a specific form. In one embodiment of the present invention, design, media, and content are the primary facets of a composition. A composition typically results from a request to render a media-specific presentation of an open document. The present invention is able to elaborate the document structure as necessary to compute fully explicit layout and drawing information.

It is clear from the above passage of Brintzenhofe et al. that Brintzenhofe et al. fails to disclose or suggest obtaining a list of document components associated with an interpreted page, the list of document components including cacheable reusable document components and non-cached document components associated with the interpreted page because this passage is void of any discussion pertaining to obtaining any type of list.

Moreover, the above passage of Brintzenhofe et al. is void of any discussion pertaining to a list of document components including cacheable reusable document components and non-cached document components associated with the interpreted page.

As previously pointed out in the Appeal Brief, Brintzenhofe et al. fails to disclose or suggest identifying the cacheable reusable document components included in the obtained list of documents components associated with the interpreted page.

In further rebuttal, the Examiner asserts that Brintzenhofe et al. teaches; at paragraph [0086], lines 3-9; that “the cacheable reusable document is identified as the file, identifying the cacheable reusable document components included in the obtained list of document components associated [sic] the interpreted page.”

Again, it is clear from the above passage of Brintzenhofe et al. that Brintzenhofe et al. fails to disclose or suggest identifying the cacheable reusable document components included in the obtained list of documents components associated with the interpreted page because this passage is void of any discussion pertaining to an identification process to identify cacheable reusable document components.

Furthermore, the above passage of Brintzenhofe et al. is void of any discussion pertaining to cacheable reusable document components which included in the obtained list of documents components associated with the interpreted page because this passage is void of any discussion pertaining to a list of documents components associated with the interpreted page.

As previously set forth in the Appeal Brief, the Examiner alleges that McBrearty et al. teaches that a web page is obtained from a server and a check is made to determine if non-cached components are present.

Notwithstanding the Examiner's assertion, the actual teachings of McBrearty et al. fail to support the Examiner's characterization of the process described by McBrearty et al. More specifically, McBrearty et al. teaches that when a web page is requested, the process checks to determine if the web page has been cached or not cached.

In contrast, the presently claimed invention clearly sets forth the obtainment of a list of document components associated with an interpreted page, the list of document components including cacheable reusable document components and non-cached document components associated with the interpreted page.

Moreover, the presently claimed invention clearly sets forth that each interpreted page has cacheable reusable document components and non-cached document components.

Lastly, the presently claimed invention clearly sets forth the identification of the cacheable reusable document components included in the obtained list of documents components associated with the interpreted page.

Checking if a web page has been cached, as taught by McBrearty et al., fails to teach or suggest obtaining a list of document components associated with an interpreted page, the list of document components including cacheable reusable document components and non-cached document components associated with the interpreted page; and/or identifying the cacheable reusable document components included in the obtained list of documents components associated with the interpreted page.

In rebuttal, the Examiner asserts that the teachings of McBrearty et al.; at column 9, lines 28-34; are merely relied upon to show obtaining a list of document components and non-cached document components associated with the interpreted page. Notwithstanding this assertion, these specific teachings of McBrearty et al. fail to teach or suggest obtaining a list of document components and non-cached document components associated with the interpreted page.

More specifically, McBrearty et al. discloses; at column 9, lines 28-54:

FIG. 5 is a flow chart illustrating the processes of one embodiment of the present invention. The process begins (step 501) after the web browser is executed on the data processing system. The user requests a web page (step 503). The request is handled either by a remote server connected to the user data processing system via the Internet (or Intranet) or alternatively by a local browser cache of the data processing system. (i.e., it was previously downloaded) A check is made to determine if the requested page is in the user's browser cache (step 505). If the web page is in the browser cache, the user's preference is read and a determination is made of whether to use the cached file instead of downloading the file from the server (step 509) based on the user preference. The user preference may be entered during setup of the web browser application or on a prompt to the user prior to retrieving the web page. If the cache file is to be used, the processor searches for the cached file in the user's browser cache directory (step 515). If the cache file is found, then it is read from the user's browser cache directory (step 516). The web page is then displayed with a cache indicator (step 517) alerting the user that the displayed web page was retrieved from the cache. The user may then select the refresh button to force a download from the server via the Internet. When this page is reloaded with a non-cached web page, the cached-page indicator is removed to show the new status of the displayed page. If, however, the cache file is not found (i.e., the requested page is not cached or has been purged from the cache file directory), the remote server is contacted and the web page downloaded via the Internet (step 513).

Again, it is clear from the above passage of McBrearty et al. that McBrearty et al. fails to disclose or suggest obtaining a list of document components and non-cached document components associated with the interpreted page because this passage is void of any discussion pertaining to document components or non-cached document components.

More specifically, the above passage of McBrearty et al. is clearly directed to determining if a requested file has been previously cached. The above passage of McBrearty et al. is not concern with the obtaining of any type of lists.

Thus, McBrearty et al., fails to teach or suggest obtaining a list of document components associated with an interpreted page, the list of document components including cacheable reusable document components and non-cached document components associated with the interpreted page; and/or identifying the cacheable reusable document components included in the obtained list of documents components associated with the interpreted page.

In summary, the Examiner recognizes that Brintzenhofe et al. fails to disclose obtaining a list of document components associated with an interpreted page cacheable reusable, the list of document components including cacheable reusable document components and non-cached document components associated with the interpreted page; and/or identifying the cacheable reusable document components included in the obtained list of documents components associated with the interpreted page.

Moreover, McBrearty et al. fails to disclose or suggest obtaining a list of document components associated with an interpreted page cacheable reusable, the list of document components including cacheable reusable document components and non-cached document components associated with the interpreted page; and/or identifying the cacheable reusable document components included in the obtained list of documents components associated with the interpreted page.

Therefore, contrary to the Examiner's allegations, the combination of Brintzenhofe et al. in view of McBrearty et al. fails to render the presently claimed invention, as set by independent claim 31, obvious to one of ordinary skill in the art.

Dependent Claim 32

As previously set forth in the Appeal Brief, dependent claim 32 recites caching each identified cacheable reusable document component rendered to each identified cacheable reusable document component's respective bounding box dimensions.

The Examiner asserts that Brintzenhofe et al. teaches, at paragraphs [0133] - [0135], the specific limitation of dependent claim 32.

Contrary to the Examiner's assertion, Brintzenhofe et al. teaches, at paragraphs [0133] - [0135], the relationship between a content tree and a brochure composition.

Paragraphs [0133] - [0135] of Brintzenhofe et al. are void of any discussion of each identified cacheable reusable document component rendered to each identified cacheable reusable document component's respective bounding box dimensions.

In rebuttal, the Examiner asserts that Brintzenhofe et al. teaches cached reusable components are rendered.

Contrary to the Examiner's assertions, the claimed invention is directed to caching rendered cacheable reusable document components, not rendering a composition, as taught by Brintzenhofe et al.

Therefore, contrary to the Examiner's allegations, the combination of Brintzenhofe et al. in view of McBrearty et al. fails to render the presently claimed invention, as set by dependent claim 32, obvious to one of ordinary skill in the art.

Dependent Claim 33

As previously set forth in the Appeal Brief, dependent claim 33 recites caching a composite combination of a set of identified cacheable reusable document components rendered, relative to each identified cacheable reusable document component in the composite combination, in a bounding box of sufficient size to adequately contain the composite combination.

The Examiner asserts that Brintzenhofe et al. teaches, at paragraphs [0100], [0111], and [0125], the specific limitation of dependent claim 33.

Paragraphs [0100], [0111], and [0125] of Brintzenhofe et al. are void of any discussion of caching a composite combination of a set of identified cacheable reusable document components.

In rebuttal, the Examiner asserts that Brintzenhofe et al. teaches the cached reusable components are rendered.

Contrary to the Examiner's assertions, the claimed invention is directed to caching rendered cacheable reusable document components, not rendering a composition, as taught by Brintzenhofe et al.

Therefore, contrary to the Examiner's allegations, the combination of Brintzenhofe et al. in view of McBrearty et al. fails to render the presently claimed invention, as set by dependent claim 33, obvious to one of ordinary skill in the art.

Accordingly, in view of all the reasons set forth above, the Honorable Board is respectfully requested to reconsider and overturn the present rejection under 35 U.S.C. §103.

B. Rejection of Claim 2 under 35 U.S.C. §103

Claim 2 has been rejected under 35 U.S.C. §103 for being unpatentable over Gauthier (Published US Patent Application 2004/0141197) in view of McBrearty et al. (US Patent Number 6,744,452). This rejection is respectfully traversed.

As previously set forth in the Appeal Brief, the Examiner recognizes that Gauthier fails to disclose assessing the rendered page for the possibility of having an underlay-overlay pair.

With respect to McBrearty et al., the Examiner alleges that McBrearty et al. teaches that a web page is obtained from a server and a check is made to determine if non-cached components are present. The Examiner asserts that the Applicant teaches an underlay-overlay pair implies cached and non-cached components.

Notwithstanding the Examiner's assertion, the actual teachings of McBrearty et al. fail to support the Examiner's characterization of the process described by McBrearty et al. More specifically, McBrearty et al. teaches that when a web page is requested, the process checks to determine if the web page has been cached, not components of the page.

In contrast, the presently claimed invention clearly sets forth assessing the rendered page for the possibility of having an underlay-overlay pair.

Checking if an entire web page has been cached, as taught by McBrearty et al., fails to teach or suggest assessing the rendered page for the possibility of having an underlay-overlay pair, as set forth by independent claim 2.

In rebuttal, the Examiner asserts that the specification defines an underlay-overlay pair as being a pair of cached and non-cached document components. Given this interpretation, McBrearty et al. fails to disclose assessing the rendered page for the possibility of having an underlay-overlay pair.

More specifically, the Examiner asserts that McBrearty et al. teaches that a web page is checked for non-cached components. The Applicant respectfully submits that checking for non-cached components fails to teach or suggest assessing the rendered page for the possibility of having an underlay-overlay pair.

In other words, the presently claimed invention sets forth more than looking for non-cached components. The presently claimed invention sets forth assessing the existence of two items and a relationship therebetween (pairing).

In rebuttal, the Examiner merely asserts reliance upon an interpretation that an underlay-overlay is cached and non-cached components.

As described in the specification, an underlay has structure and thus, the underlay is not just a set of cached components. Therefore, the Examiner's interpretation that an underlay-overlay pair is just a set of cached and non-cached components is improper.

In summary, the Examiner recognizes that Gauthier fails to disclose assessing the rendered page for the possibility of having an underlay-overlay pair. Moreover, McBrearty et al. fails to disclose or suggest assessing the rendered page for the possibility of having an underlay-overlay pair because McBrearty et al. discloses checking if an entire web page has been cached.

Therefore, contrary to the Examiner's allegations, the combination of Gauthier in view of McBrearty et al. fails to render the presently claimed invention, as set by independent claim 2, obvious to one of ordinary skill in the art.

Accordingly, in view of all the reasons set forth above, the Honorable Board is respectfully requested to reconsider and overturn the present rejection under 35 U.S.C. §103.

C. Rejection of Claims 8-16 under 35 U.S.C. §103

Claims 8-16 have been rejected under 35 U.S.C. §103 for being unpatentable over Gauthier (Published US Patent Application 2004/0141197) in view of Brintzenhofe et al. (Published US Patent Application 2005/0223320) and Freund (US Patent Number 5,870,769). This rejection is respectfully traversed.

Independent claim 8

As previously set forth in the Appeal Brief, the Examiner recognizes that the combined teachings of Gauthier and Brintzenhofe et al. fail to disclose a page description language interpreter that combines some of the reusable document components into composites of reusable document components and combines some of the reusable document components with respect to the relative positions of the reusable document components into composites of reusable underlays.

With respect to Freund, the Examiner alleges that Freund teaches that the visual characteristics of a displayed link status indicator indicate if the document is stored in cache. Moreover, the Examiner alleges that Freund teaches if the user selects a link status indicator, the document is stored in cache without displaying the document to the user.

Notwithstanding the Examiner's assertions with respect to the teachings of Freund, the Applicant cannot readily ascertain how the Examiner's characterization of the teachings of Freund has any relevance to a page description language interpreter that combines some of the reusable document components into composites of reusable document components and combines some of the reusable document components with respect to the relative positions of the reusable document components into composites of reusable underlays.

In other words, the Examiner's characterization of the teachings of Freund fails to have any relevance to a page description language interpreter that combines some of the reusable document components into composites of reusable document components and combines some of the reusable document components with respect to the relative positions of the reusable document components into composites of reusable underlays.

It is respectfully submitted that displaying a link status indicator in such a manner to indicate if the document is stored in cache is not relevant to a page description language interpreter that combines some of the reusable document components into composites of reusable document components and combines some of the reusable document components with respect to the relative positions of the reusable document components into composites of reusable underlays.

Furthermore, it is respectfully submitted that the selecting of a link status indicator so that a document is stored in cache without displaying the document to the user is not relevant to a page description language interpreter that combines some of the reusable document components into composites of reusable document components and combines some of the reusable document components with respect to the relative positions of the reusable document components into composites of reusable underlays.

In rebuttal, the Examiner has failed to explain how the displaying of a link status indicator teaches a page description language interpreter that combines some of the reusable document components into composites of reusable document components and combines some of the reusable document components with respect to the relative positions of the reusable document components into composites of reusable underlays.

More specifically, the teachings of Freund are not directed to composites of reusable document components. Thus, teachings of Freund fail to provide any basis for the Examiner's assertion that the prior art teaches a page description language interpreter that combines some of the reusable document components into composites of reusable document components and combines some of the reusable document components with respect to the relative positions of the reusable document components into composites of reusable underlays.

Therefore, contrary to the Examiner's assertions, Freund fails to disclose a page description language interpreter that combines some of the reusable document components into composites of reusable document components and combines some of the reusable document components with respect to the relative positions of the reusable document components into composites of reusable underlays.

In rebuttal, the Examiner merely asserts reliance upon an interpretation that an underlay-overlay is cached and non-cached components.

As described in the specification, an underlay has structure and thus, the underlay is not just a set of cached components. Therefore, the Examiner's interpretation that an underlay-overlay pair is just a set of cached and non-cached components is improper.

In summary, the Examiner recognizes that the combined teachings of Gauthier and Brintzenhofe et al. fail to disclose a page description language interpreter that combines some of the reusable document components into composites of reusable document components and combines some of the reusable document components with respect to the relative positions of the reusable document components into composites of reusable underlays.

Moreover, Freund fails to disclose or suggest a page description language interpreter that combines some of the reusable document components into composites of reusable document components and combines some of the reusable document components with respect to the relative positions of the reusable document components into composites of reusable underlays.

Therefore, contrary to the Examiner's allegations, the combination of Gauthier in view of Brintzenhofe et al. and Freund fails to render the presently claimed invention, as set by independent claim 8, obvious to one of ordinary skill in the art.

Dependent Claim 13

As previously set forth in the Appeal Brief, dependent claim 13 recites a repository index that indexes image representations stored in the reusable document component repository, the repository index communicating with the interpreter to identify images to be retrieved.

The Examiner asserts that the database of Gauthier teaches a repository index.

Contrary to the Examiner's assertions, Gauthier teaches that the database stores templates. The database is not an index for indexing the image representations stored in a reusable document component repository.

In rebuttal, the Examiner asserts that Gauthier teaches, at paragraph [0049], a repository index that indexes image representations stored in the reusable document component repository, and the repository index communicating with the interpreter to identify images to be retrieved.

Contrary to the Examiner's assertions, Gauthier explicitly teaches, at paragraph [0049], that the operations of the interpreter have been terminated prior to the initiation of the merge task operations. Thus, paragraph [0049] of Gauthier cannot teach that the merge task communicates with the interpreter to identify images to be retrieved because the operations of the interpreter have been terminated.

Therefore, contrary to the Examiner's allegations, the combination of Gauthier in view of Brintzenhofe et al. and Freund fails to render the presently claimed invention, as set by dependent claim 13, obvious to one of ordinary skill in the art.

Dependent Claim 14

As previously set forth in the Appeal Brief, dependent claim 14 recites a ping path between the interpreter and the reusable document component repository by which the interpreter pings the reusable document component repository responsive to the repository index indicating that a selected image representation is contained in the reusable document component repository, the pinging directing the reusable document component repository not to delete of the selected image representation.

The Examiner asserts that paragraph [0051] of Gauthier teaches a ping path between the interpreter and the reusable document component repository by which the interpreter pings the reusable document component repository responsive to the repository index indicating that a selected image representation is contained in the reusable document component repository, the pinging directing the reusable document component repository not to delete of the selected image representation.

Contrary to the Examiner's assertions, paragraph [0051] of Gauthier is void of any discussion that the pinging directs the reusable document component repository not to delete of the selected image representation.

In rebuttal, the Examiner asserts that the existing template bit map is over written and thus, the "pinging" directs the reusable document component repository not to delete of the selected image representation.

As taught by Gauthier, the merge task retrieves graphics state attributes and generates a bitmap therefrom.

As previously submitted, Gauthier explicitly teaches, at paragraph [0049], that the operations of the interpreter have been terminated prior to the initiation of the merge task operations.

Thus, contrary to the Examiner's explanation, the interpreter cannot ping any device when the merge task is retrieving graphics state attributes because the operations of the interpreter have been terminated prior to the initiation of the merge task operations.

Therefore, contrary to the Examiner's allegations, the combination of Gauthier in view of Brintzenhofe et al. and Freund fails to render the presently claimed invention, as set by dependent claim 14, obvious to one of ordinary skill in the art.

Accordingly, in view of all the reasons set forth above, the Honorable Board is respectfully requested to reconsider and overturn the present rejection under 35 U.S.C. §103.

D. Rejection of Claims 17-27 under 35 U.S.C. §103

Claims 17-27 have been rejected under 35 U.S.C. §103 for being unpatentable over Gauthier (Published US Patent Application 2004/0141197) in view of Brintzenhofe et al. (Published US Patent Application 2005/0223320). This rejection is respectfully traversed.

Independent claim 17

As previously set forth in the Appeal Brief, with respect to Brintzenhofe et al., the Examiner alleges that Brintzenhofe et al. teaches the adding of content to the composition. Moreover, the Examiner alleges that the adding of content to the composition, as taught by Brintzenhofe et al., discloses combining some of the reusable document components into composites of reusable document components and combining some of the reusable document components with respect to the relative positions of the reusable document components into composites of reusable underlays.

Contrary to the Examiner's assertions, although Brintzenhofe et al. discloses, at paragraph [0150], the adding of content to the composition, such a teaching is not relevant to combining some of the reusable document components into composites of reusable document components and combining some of the reusable document components with respect to the relative positions of the reusable document components into composites of reusable underlays.

More specifically, the adding of content to an existing composition does not teach the combining of reusable document components into composites of reusable document components. Moreover, the adding of content to an existing composition does not teach the combining of reusable document components with respect to the relative positions of the reusable document components into composites of reusable underlays.

The Examiner has failed to provide any reasoning or argument that would demonstrate how the adding of content to an existing composition teaches combining some of the reusable document components into composites of reusable document components and combining some of the reusable document components with respect to the relative positions of the reusable document components into composites of reusable underlays.

Brintzenhofe et al. fails to disclose combining some of the reusable document components into composites of reusable document components and combining some of the reusable document components with respect to the relative positions of the reusable document components into composites of reusable underlays.

In rebuttal, the Examiner re-asserts that Brintzenhofe et al. discloses adding content to a composition so that each tree is changed accordingly. The Examiner also asserts that the components are combined with respect to position.

Brintzenhofe et al. discloses, contrary to the Examiner's position, that content from a word processor is grouped and imported into a composition.

Brintzenhofe et al. fails to disclose that the content is comprised of reusable document components.

Moreover, Brintzenhofe et al. fails to disclose that the content is combined to form composites of reusable document components.

Lastly, Brintzenhofe et al. fails to disclose that the content is combined to form composites of reusable underlays.

Therefore, contrary to the Examiner's allegations, the combination of Gauthier in view of Brintzenhofe et al. fails to render the presently claimed invention, as set by independent claim 17, obvious to one of ordinary skill in the art.

Dependent Claim 18

As previously set forth in the Appeal Brief, dependent claim 18 recites that the storing of the generated image representation in the reusable document component repository includes associating a life span parameter with the generated image representation; and responsive to an expiration of the life span parameter, removing the corresponding generated image representation from the reusable document component repository.

The Examiner asserts that paragraph [0028] of Gauthier teaches that the storing of the generated image representation in the reusable document component repository includes associating a life span parameter with the generated image representation; and responsive to an expiration of the life span parameter, removing the corresponding generated image representation from the reusable document component repository.

Contrary to the Examiner's assertions, paragraph [0028] of Gauthier is void of any discussion that the storing of the generated image representation in the reusable document component repository includes associating a life span parameter with the generated image representation; and responsive to an expiration of the life span parameter, removing the corresponding generated image representation from the reusable document component repository.

More specifically, paragraph [0028] of Gauthier teaches storing a PostScript™ attribute in a stack and deleting a PostScript™ attribute from a stack. The storing and deleting are not related to or dependent upon a life span parameter.

In rebuttal, the Examiner asserts that the stack taught by Gauthier is a life-time stack, notwithstanding that the teachings of Gauthier are completely void of such a characterization of the stack.

Paragraph [0028] of Gauthier merely teaches that a PostScript™ attribute can be deleted from a stack. Gauthier is void of any discussion pertaining to an expiration of the life span parameter triggering the removal of the corresponding generated image representation from the reusable document component repository.

Therefore, contrary to the Examiner's allegations, the combination of Gauthier in view of Brintzenhofe et al. fails to render the presently claimed invention, as set by dependent claim 18, obvious to one of ordinary skill in the art.

Dependent Claim 19

As previously set forth in the Appeal Brief, dependent claim 19 recites that the associating of the life span parameter with the generated rasterized image includes associating one of a temporal life span and an indication of permanence with the generated image representation.

The Examiner asserts that paragraph [0044] of Gauthier teaches that the associating of the life span parameter with the generated rasterized image includes associating one of a temporal life span and an indication of permanence with the generated image representation.

Contrary to the Examiner's assertions, paragraph [0044] of Gauthier is void of any discussion pertaining to associating of the life span parameter with the generated rasterized image includes associating one of a temporal life span and an indication of permanence with the generated image representation.

More specifically, paragraph [0044] of Gauthier teaches that to reserve a graphics state, certain attributes are combined with the PostScript™ attributes on the stack. The reserving of a graphics state is not related to or dependent upon a life span parameter.

In rebuttal, the Examiner asserts that the obtained name taught by Gauthier is a temporal life-span, notwithstanding that the teachings of Gauthier are completely void of such a characterization of the obtained name.

Paragraph [0044] of Gauthier merely teaches that attributes can be combined with PostScript™ attributes from a stack. Gauthier is void of any discussion pertaining to associating of the life span parameter with the generated rasterized image includes associating one of a temporal life span and an indication of permanence with the generated image representation.

Therefore, contrary to the Examiner's allegations, the combination of Gauthier in view of Brintzenhofe et al. fails to render the presently claimed invention, as set by dependent claim 19, obvious to one of ordinary skill in the art.

Dependent Claim 20

As previously set forth in the Appeal Brief, dependent claim 20 recites that the life span parameter is such that the generated image representation remains available in the reusable document component repository for reuse in the construction of subsequent documents.

The Examiner asserts that paragraph [0045] of Gauthier teaches that the life span parameter is such that the generated image representation remains available in the reusable document component repository for reuse in the construction of subsequent documents.

Contrary to the Examiner's assertions, paragraph [0045] of Gauthier is void of any discussion that the life span parameter is such that the generated image representation remains available in the reusable document component repository for reuse in the construction of subsequent documents.

More specifically, paragraph [0045] of Gauthier teaches the process of linking the font cache to the graphics state.

In rebuttal, the Examiner asserts that graphics state attributes are continued to be defend after the interpreter is resumed.

Paragraph [0045] of Gauthier merely teaches that attributes can be combined with PostScript™ attributes from a stack. Gauthier is void of any discussion pertaining to the life span parameter being such that the generated image representation remains available in the reusable document component repository for reuse in the construction of subsequent documents.

Therefore, contrary to the Examiner's allegations, the combination of Gauthier in view of Brintzenhofe et al. fails to render the presently claimed invention, as set by dependent claim 20, obvious to one of ordinary skill in the art.

Dependent Claim 22

As previously set forth in the Appeal Brief, dependent claim 22 recites that the querying includes tracking previously generated image representations; and conditional upon the tracking indicating that a previously generated image representation corresponds to the selected reusable document component, verifying the previously generated image representation currently resides in the reusable document component repository.

The Examiner asserts that paragraphs [0031] and [0032] of Gauthier teaches that the querying includes tracking previously generated image representations; and conditional upon the tracking indicating that a previously generated image representation corresponds to the selected reusable document component, verifying the previously generated image representation currently resides in the reusable document component repository.

Contrary to the Examiner's assertions, paragraphs [0031] and [0032] of Gauthier is void of any discussion that the querying includes tracking previously generated image representations; and conditional upon the tracking indicating that a previously generated image representation corresponds to the selected reusable document component, verifying the previously generated image representation currently resides in the reusable document component repository.

Therefore, contrary to the Examiner's allegations, the combination of Gauthier in view of Brintzenhofe et al. fails to render the presently claimed invention, as set by dependent claim 22, obvious to one of ordinary skill in the art.

Dependent Claim 23

As previously set forth in the Appeal Brief, dependent claim 23 recites that the querying includes, conditional upon a successful verifying, marking the previously generated image representation to prevent a removing thereof.

The Examiner asserts that paragraph [0049] of Gauthier teaches that the querying includes, conditional upon a successful verifying, marking the previously generated image representation to prevent a removing thereof.

Contrary to the Examiner's assertions, paragraph [0049] of Gauthier is void of any discussion that the querying includes, conditional upon a successful verifying, marking the previously generated image representation to prevent a removing thereof.

More specifically, paragraph [0049] of Gauthier teaches the post interpreter process of combining the variable data with a template.

Therefore, contrary to the Examiner's allegations, the combination of Gauthier in view of Brintzenhofe et al. fails to render the presently claimed invention, as set by dependent claim 23, obvious to one of ordinary skill in the art.

Accordingly, in view of all the reasons set forth above, the Honorable Board is respectfully requested to reconsider and overturn the present rejection under 35 U.S.C. §103.

Conclusion

Accordingly, for all the reasons set forth above, the Honorable Board is respectfully requested to reverse the outstanding rejection under 35 U.S.C. §103. Also, an early indication of allowability is earnestly solicited.

Respectfully submitted,



Michael J. Nickerson
Registration No. 33,265
Basch & Nickerson LLP
1777 Penfield Road
Penfield, New York 14526
Telephone: (585) 899-3970
Customer No. 75931

MJN/mjn